

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

NICHOLAS DeFOSSETT, )  
                          )  
Plaintiff,             )  
                          ) CIVIL ACTION  
vs.                    )  
                          ) FILE No. 5:19-cv-695  
RUDEL FAMILY LIMITED )  
PARTNERSHIP d/b/a JACALA )  
RESTAURANT,            )  
                          )  
Defendant.            )

**UNOPPOSED MOTION TO DISMISS COMPLAINT WITH PREJUDICE**

COMES NOW the Plaintiff, Nicolas DeFossett (“Plaintiff”), by and through the undersigned counsel, and hereby files this Unopposed Motion to Dismiss Complaint with Prejudice.

Respectfully submitted this 21<sup>st</sup> day of April, 2020.

Respectfully submitted,

**KURZ LAW GROUP, LLC**  
4355 Cobb Parkway, Suite J-285  
Atlanta, GA 30339  
[www.kurzlawgroup.com](http://www.kurzlawgroup.com)  
(404) 805-2494 Telephone  
(770) 428-5356 Facsimile

By: /s/ Dennis R. Kurz  
Dennis R. Kurz  
Texas State Bar No. 24068183  
[dennis@kurzlawgroup.com](mailto:dennis@kurzlawgroup.com)  
ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day of April, 2020, a true and correct copy of the foregoing document was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system.

Michael D. DeNuccio  
CURNY, FARMER, HOUSE, OSUNA &  
JACKSON, P.C.  
411 Heimer Road  
San Antonio, TX 78232  
*Attorney for Defendant,*  
*Rudel Family Limited Partnership*  
*d/b/a Jacala Restaurant*

/s/ Dennis R. Kurz

Dennis R. Kurz